

Message

From: Ex. 6 Personal Privacy (PP)
Sent: 7/22/2020 3:33:48 PM
To: Ex. 6 Personal Privacy (PP)
Subject: FW: P-19-0055

To keep you in the loop, per Ex. 6 Personal Privacy (PP) reminder to alert management early. Besides that other Rich Engler hair on fire (revocation of SNUR), this one is a potential one too.

Ex. 6 Personal Privacy (PP)

Chemical Control Division
US Environmental Protection Agency

Ex. 6 Personal Privacy (PP)

From: Ex. 6 Personal Privacy (PP)
Sent: Wednesday, July 22, 2020 11:15 AM
To: Ex. 6 Personal Privacy (PP)
Cc: Ex. 6 Personal Privacy (PP)
Subject: Re: P-19-0055

I am starting now to review 20-1.5e

Sent from my iPhone

On Jul 22, 2020, at 11:06 AM, Ex. 6 Personal Privacy (PP) wrote:

Ex. 6 Personal Privacy (PP) I know I just sent this to you for your review, but if you could expedite it would be appreciated. Do I send to Ex. 6 Personal Privacy (PP) too?

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Chemical Control Division
US Environmental Protection Agency

Ex. 6 Personal Privacy (PP)

From: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Sent: Wednesday, July 22, 2020 10:45 AM
To: Ex. 6 Personal Privacy (PP)
Subject: FW: P-19-0055
Importance: High

Can one of you please explain the delay??

Thank you for the response. Can you please explain this delay?

There were no relevant comments received to the proposed SNUR. Why wouldn't the proposed SNUR just be approved due to no public comment and get published? Our Supply Chain for this product has been shut completely down for this entire year as we have a 3-tier supply chain (import, processing and final industrial use)! This is unacceptable!

We cannot wait til mid August for a publication, we need it this month!

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

RAHN USA Corp.
1005 North Commons Drive Aurora, IL 60504
T +1 906 424 4345
kimberley.seth@rahn-group.com
www.rahn-group.com

From: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Sent: Friday, July 10, 2020 1:30 PM
To: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Subject: RE: P-19-0055

Kym - We were working on the batch of chemicals with your PMN this week. It will be going into management review next week. I would expect it to be signed either by the end of this month or the first week in August. That means it will publish around August 15. Check in on August 1 and hopefully it will still be on track for that publication date.

[REDACTED]

Ex. 6 Personal Privacy (PP)

Chemical Control Division
EPA East
1200 Pennsylvania Ave. NW
Room [REDACTED] Mail Code 7405M
Washington, DC 20460

Ex. 6 Personal Privacy (PP)

From: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Sent: Friday, July 10, 2020 12:02 PM
To: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Subject: FW: P-19-0055
Importance: High

[REDACTED]

May you please provide an update when the final SNUR will be published for P-19-0055?

Thank you,
Kym

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

RAHN USA Corp.
1005 North Commons Drive Aurora, IL 60504
T +1 906 424 4345
kimberley.seth@rahn-group.com
www.rahn-group.com

From: Kimberley Seth
Sent: Tuesday, July 7, 2020 10:58 PM
To: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Subject: FW: P-19-0055
Importance: High

Hi [REDACTED] **Ex. 6 Personal Privacy (PP)**

Could you please provide an update in [REDACTED] absence?

Thank you,
Kym

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

RAHN USA Corp.
1005 North Commons Drive Aurora, IL 60504
T +1 906 424 4345
kimberley.seth@rahn-group.com
www.rahn-group.com

From: Kimberley Seth
Sent: Tuesday, July 7, 2020 10:56 PM
To: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Subject: RE: P-19-0055
Importance: High

[REDACTED]

Can you please provide an update? I am hoping the final SNUR will be published very soon??

Thanks,
Kym

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

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1005 North Commons Drive Aurora, IL 60504
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kimberley.seth@rahn-group.com
www.rahn-group.com

From: [REDACTED] **Ex. 6 Personal Privacy (PP)**
Sent: Thursday, June 11, 2020 7:37 AM
To: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Subject: RE: P-19-0055

Sorry Kym for my delay -

Note that the public comment period on the proposed rule just ended June 3. Now we start in on the final SNUR, including a response to comments received. I know your SNUR is very important to you and that this is very frustrating. With many other SNURs in our pipeline, either proposed and final, I can only promise to get to it as soon as possible. I will alert my management.

Thanks for understanding,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Chemical Control Division
US Environmental Protection Agency

Ex. 6 Personal Privacy (PP)

From: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Sent: Wednesday, June 10, 2020 9:36 PM
To: Ex. 6 Personal Privacy (PP)
Subject: RE: P-19-0055
Importance: High

Please let me know if there is someone else I should be communicating with? I have failed to get any responses from you.

Thanks,
Kym

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

RAHN USA Corp.
1005 North Commons Drive Aurora, IL 60504
T +1 906 424 4345
kimberley.seth@rahn-group.com
www.rahn-group.com

From: Kimberley Seth
Sent: Tuesday, June 2, 2020 8:52 AM
To: Ex. 6 Personal Privacy (PP)
Subject: FW: P-19-0055
Importance: High



Can you please respond? I am getting asked everyday what is the promulgation date...

Thank you,
Kym

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

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1005 North Commons Drive Aurora, IL 60504
T +1 906 424 4345
kimberley.seth@rahn-group.com
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From: Kimberley Seth

Sent: Monday, May 4, 2020 6:37 PM

To: Ex. 6 Personal Privacy (PP)

Subject: RE: P-19-0055

Importance: High



Can you please elaborate on next steps and timeline? My understanding is that the comment period for our Proposed SNUR will end tomorrow, June 3rd, 2020.

How long before EPA publishes the final SNUR? Once the final SNUR is published, does our 75 day timeframe start from the Consent Order?

What can we do to expedite this? Right now, best case scenario is we can import is September 2020?!

Thanks,
Kym

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

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1005 North Commons Drive Aurora, IL 60504
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kimberley.seth@rahn-group.com
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From: Ex. 6 Personal Privacy (PP)

Sent: Thursday, April 30, 2020 12:41 PM

To: Kimberley Seth <Kimberley.Seth@rahn-group.com>

Subject: RE: P-19-0055

Kim -

I just received word that this proposed rule will publish in the FR on May 4.

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Chemical Control Division
US Environmental Protection Agency

Ex. 6 Personal Privacy (PP)

From: Ex. 6 Personal Privacy (PP)
Sent: Monday, April 27, 2020 5:22 PM
To: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Subject: RE: P-19-0055


It was approved by management 4/21 and sent to the EPA liaison to the Federal Register Office, but not yet to the FR office. Need to check again.

Ex. 6 Personal Privacy (PP)

Chemical Control Division
US Environmental Protection Agency

Ex. 6 Personal Privacy (PP)

From: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Sent: Monday, April 27, 2020 1:53 PM
To: Ex. 6 Personal Privacy (PP)
Subject: FW: P-19-0055

 please advise.

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

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1005 North Commons Drive Aurora, IL 60504
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kimberley.seth@rahn-group.com
www.rahn-group.com

From: Kimberley Seth
Sent: Thursday, April 23, 2020 8:28 AM
To: Ex. 6 Personal Privacy (PP)
Subject: RE: P-19-0055



Please advise any feedback from your management? Why was this not able to be published this month in the Federal Register as it was already signed? Please advise when the SNUR will be published.

As stated before, we have a 3 tier supply chain and this has completely stopped our business for this substance.

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

RAHN USA Corp.
1005 North Commons Drive Aurora, IL 60504
T +1 906 424 4345
kimberley.seth@rahn-group.com

From: Ex. 6 Personal Privacy (PP)
Sent: Tuesday, April 21, 2020 10:24 AM
To: Kimberley Seth <Kimberley.Seth@rahm-group.com>
Subject: RE: P-19-0055

Kim - I totally understand your frustration and would understand any need to elevate. I will forward your email, again, to management. The proposed rule has been signed but caught up in getting to the Fed Reg office.

Ex. 6 Personal Privacy (PP)

Chemical Control Division
US Environmental Protection Agency

Ex. 6 Personal Privacy (PP)

From: Kimberley Seth <Kimberley.Seth@rahm-group.com>
Sent: Tuesday, April 21, 2020 11:18 AM
To: Ex. 6 Personal Privacy (PP)
Subject: RE: P-19-0055

Hi 

I know that today is the deadline for SNUR publication for April. Will this finally be published this month? I would hate to get legal involved again on this PMN.

Thanks,
Kym

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHM USA

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1005 North Commons Drive Aurora, IL 60504
T +1 906 424 4345
kimberley.seth@rahm-group.com
www.rahm-group.com

From: Ex. 6 Personal Privacy (PP)
Sent: Tuesday, April 14, 2020 9:24 AM
To: Kimberley Seth <Kimberley.Seth@rahm-group.com>
Subject: RE: P-19-0055

I'm really sorry about the bureaucracy around here. This batch rule was finally signed yesterday - after I asked - because it had been languishing - so, now it's moving and the next step (which I will also need to remind them about) is to move forward to the Federal Register for publication.

Hang in there.

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Chemical Control Division
US Environmental Protection Agency

Ex. 6 Personal Privacy (PP)

From: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Sent: Tuesday, April 14, 2020 10:09 AM
To: Ex. 6 Personal Privacy (PP)
Subject: RE: P-19-0055

Good morning [REDACTED]

Do you have any updates?

Kym

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

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1005 North Commons Drive Aurora, IL 60504
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kimberley.seth@rahn-group.com
www.rahn-group.com

From: Ex. 6 Personal Privacy (PP)
Sent: Tuesday, April 7, 2020 9:22 AM
To: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Subject: RE: P-19-0055

Sorry Kim - I never got back to you. I had sent it forward to upper management for their review after I saw your March 30 note and I just checked on status again. Bureaucracy. Will get back to you.

Ex. 6 Personal Privacy (PP)

Chemical Control Division
US Environmental Protection Agency

Ex. 6 Personal Privacy (PP)

From: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Sent: Tuesday, April 7, 2020 10:13 AM
To: Ex. 6 Personal Privacy (PP)
Subject: FW: P-19-0055
Importance: High

[REDACTED]

Please advise. You were estimating mid-March which has come and gone.

Kym

Best regards,

Kimberley Seth
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1005 North Commons Drive Aurora, IL 60504
T +1 906 424 4345
kimberley.seth@rahn-group.com
www.rahn-group.com

From: Kimberley Seth
Sent: Monday, March 30, 2020 8:13 PM
To: Ex. 6 Personal Privacy (PP)
Subject: FW: P-19-0055
Importance: High

Hi ,

I hope you and your family are healthy and well. Can you please advise where this is at? Our supply chain is at a standstill and we need this to go for publication ASAP.

Thanks,
Kym

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

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kimberley.seth@rahn-group.com
www.rahn-group.com

From: Kimberley Seth
Sent: Sunday, March 8, 2020 10:52 PM
To: Ex. 6 Personal Privacy (PP)
Subject: RE: P-19-0055
Importance: High



I wanted to touch base and see if you had a firm date yet? Please advise.

Thank you,
Kym

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

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UV + EB Technology and Expo
RAHN at booth # 309
March 9-11, 2020 - Orlando, FL

American Coatings Show
RAHN at booth # 2460
March 31 - April 2, 2020
Indianapolis, IN

From: Ex. 6 Personal Privacy (PP)
Sent: Monday, February 10, 2020 7:30 AM
To: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Subject: RE: P-19-0055

Hi Kimberley - we are assembling a batch rule right now, with a number of chemicals. Hopefully mid March ETA.

Ex. 6 Personal Privacy (PP)

Chemical Control Division
US Environmental Protection Agency

Ex. 6 Personal Privacy (PP)

From: Kimberley Seth <Kimberley.Seth@rahn-group.com>
Sent: Friday, February 7, 2020 9:23 AM
To: Ex. 6 Personal Privacy (PP)
Subject: P-19-0055
Importance: High

Good morning

I wanted to check on the status of the SNUR. The Consent Order that is in place for this substance has halted our supply chain, as we have a 3-tier supply chain (import, processing and final industrial use).

Can you give me an ETA?

Thanks,
Kym

Best regards,

Kimberley Seth
Manager Regulatory Affairs North America RAHN USA

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Indianapolis, IN

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